IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

In re TERRORIST ATTACKS ON SEPTEMBER 11, 2001

Case No. 1:03-md-01570-GBD-SN

This document relates to:

Rodriguez, et al. v. The Islamic Republic of Iran, No. 18-cv-12347

MOTION TO SUBSTITUTE PARTIES PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 15(d)

Pursuant to Fed. R. Civ. P. 15(d) plaintiffs move the Court to allow substitution of the following parties in the above referenced action. The party being substituted is Rosa Jimenez as administrator of the Estate of Luis Jimenez, Jr., deceased. She is the mother of the 9/11 decedent, Luis Jimenez, Jr. and is substituted for her husband, Luis Jimenez, Sr., who died during the pendency of this litigation. She was appointed administrator of the estate jointly with her husband by letters administration issued November 14, 2001, such letters being unrevoked and in full force.

The following chart demonstrates the how these parties were previously named in the Complaint and how they wish to proceed going forward:

Identification of Party	Reference to Plaintiff in ECF (18-cv-	State of Residence	Decedent's Name	Paragraph of Complaint
To be	12347)	at Filing		Discussing
Substituted				Decedent
Rosa Jimenez as	Luis Jimenez, Sr.,	New York	Luis Jimenez, Jr.	ECF No. 1
Administrator of	as Administrator of			(18-cv-12347)
the Estate of	the Estate of Luis			at Allegation
Luis Jimenez,	Jimenez, Jr.,			51 of
Jr., deceased	deceased			Appendix 1

Plaintiffs propose that, upon endorsement of the Plaintiffs' Proposed Order, the substituted party would be individually entered as a Plaintiff into the Court's ECF system to ease the burden on the Clerk of Court's Office and based on the size of this MDL.

Respectfully submitted,

_/s/ Robert Keith Morgan _

Robert Keith Morgan (pro hac vice)
David J. Dickens (pro hac vice)
The Miller Firm, LLC
108 Railroad Avenue

Orange, VA 22960 Tel: 540-672-4224 Fax: 540-672-3055

kmorgan@millerfirmllc.comddickens@millerfirmllc.com

Attorneys for Plaintiffs